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In the Supreme Court of the United States

OCTOBER TERM, 1974

No. 74-988

JAMES W. McCORD, JR., PETITIONER

v.

UNITED STATES OF AMERICA

On Petition for a Writ of Certiorari to the United States Court of Appeals for the District of Columbia Circuit

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BRIEF FOR THE UNITED STATES IN OPPOSITION

OPINION BELOW

The opinion of the court of appeals (Pet. App.) is not yet reported.

JURISDICTION

The judgment of the court of appeals was entered on December 12, 1974. The petition for a writ of certiorari was filed on February 7, 1974. The jurisdiction of this Court is invoked under 28 U.S.C. 1254(1).

QUESTIONS PRESENTED

1. Whether the public disclosure of the Watergate cover-up conspiracy, a conspiracy in which petitioner participated, constitutes newly discovered evidence which now gives petitioner a defense to his conviction for participation in the Watergate break-in and electronic surveillance and entitles him to a new trial.

2. Whether petitioner was deprived of a fair trial by prosecutorial misconduct.

3. Whether petitioner was denied the effective assistance of counsel.

4. Whether petitioner was entrapped.

5. Whether impermissible prosecutorial selectivity and the pardon granted to Richard Nixon deprived petitioner of the equal protection of the laws.

STATEMENT

After a jury trial in the United States District Court for the District of Columbia, petitioner, together with G. Gordon Liddy,[1] was convicted of conspiracy, burglary, illegal interceptions of oral and wire communications, and unlawful possession of intercepting devices, all arising out of illegal entry and electronic surveillance at the offices of the Democratic National Committee at the Watergate office

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[1] Liddy's conviction was affirmed on November 8, 1974, and this Court denied certiorari on January 27, 1975. (No. 74-5678). Codefendants Hunt, Barker, Martinez, Gonzalez, and Sturgis pleaded guilty.

building. The district court denied petitioner's post-trial motion seeking collateral relief based upon newly discovered evidence,[2] and on November 9, 1974, petitioner was sentenced to imprisonment for not less than one year nor more than five years on each of eight counts, the sentences to run concurrently. On appeal, the conviction was unanimously affirmed by the court of appeals, sitting en banc (Pet. App. 1a-36a).[3]

The trial. The evidence of petitioner's guilt at trial was compelling and incontrovertible. Petitioner and four others were arrested by police officers at approximately 2:00 a.m. on June 17, 1972, in the offices of the Democratic National Committee at the Watergate office building. He had on his person or in his control documents removed from the files of the Democratic National Committee, burglary tools, electronic wiretapping and eavesdropping devices and a mace dispenser (Tr. 587-589, 601-604, 659-667, 729-733, 736, 739). At the time of his arrest, petitioner was an employee of a committee for the re-election of the President (Tr. 1347-1349), and he carried out the break-in and surveillance under the

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[2] Petitioner's motion was styled as a petition "in the nature of" a writ of error *coram nobis*, but was treated below as a motion for a new trial under Rule 33 of the Federal Rules of Criminal Procedure insofar as it sought a new trial based upon newly discovered evidence (Pet. App. 3a-5a).

[3] Petitioner's application for bail pending disposition of his petition for a writ of certiorari (No. A-658) was denied by the Chief Justice on February 10, 1975.

direction of G. Gordon Liddy, also an employee of the committee (Tr. 481, 1406-1409, 1422-1426).[4]

Petitioner previously had hired a former FBI agent to monitor telephone conversations transmitted from the Democratic National Committee from hidden eavesdropping devices. The agent was stationed in a motel room rented by petitioner and utilized equipment purchased by petitioner. All logs of the conversations were delivered to petitioner. (Tr. 909-912, 918-920, 929-934, 949, 1092, 1167, 1513, 1523-1525.) Petitioner had instructed the agent that he was interested in "any conversation involving political strategy and a personal nature—he wanted all conversations recorded" (Tr. 1031).

Post-trial disclosures. On March 19, 1973, shortly before the original date for sentencing, petitioner wrote a letter to the trial judge. He said in part that political pressure had been applied to the defendants to plead guilty and remain silent, that perjury occurred during the trial about the involvement of others and that the perjury was material to the mo-

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[4] On at least two occasions, petitioner also had engaged in attempts to install eavesdropping devices in Senator McGovern's campaign headquarters (Tr. 464-469, 477-482, 942). The principal theory of petitioner's defense at trial was "duress"—that he had committed the acts charged in the indictment as a result of a compelling concern for the safety of the re-election committee personnel and government officials and the possibility of violent demonstrations against campaign activities (Tr. 544-550). The trial court advised counsel that he would not give instructions to the jury relating to this defense (Tr. 1661-1668). Petitioner's defense consisted of three character witnesses.

tivation and intent of the defendants. As to his own motivations, he said that they "were not limited to, or simply those offered in my defense during the trial. This is no fault of my attorneys, but of the circumstances under which we had to prepare my defense."

The Senate Committee testimony. In May 1973, petitioner testified before the Senate Select Committee on Presidential Campaign Activities about the planning of clandestine intelligence activities and his involvement in the Watergate break-in and cover-up conspiracy. In brief, petitioner knew from the outset that Attorney General John Mitchell (soon to become chairman of the Committee to Re-Elect the President) was involved actively in political matters. Liddy, who was in charge of political espionage for the Committee, told him that the Watergate operations were planned in meetings among Liddy, Mitchell, John Dean (Counsel to the President), and re-election official Jeb Magruder, both in the offices of the Attorney General and in the offices of the Committee to Re-Elect the President. According to Liddy, Mitchell wanted a telephone of a senior official of the Democratic party and a room in Democratic headquarters bugged. (Senate 142, 157-158, 172-173, 183, 185.)[5] McCord further testified that although

[5] "Senate" refers to Hearings before the Senate Select Committee on Presidential Campaign Activities on Watergate and Related Activities, 93rd Cong., 1st Sess. (1973), Book 1. Although this testimony was not introduced into evidence below, both parties and the court of appeals below referred freely to the testimony.

he had become involved in the break-in because Mitchell and Dean had authorized it, he never harbored an affirmative belief in the legality of the proposed break-in (Senate 128-129, 174, 176) and knew that the break-in was part of a larger plan for gathering "political intelligence" (Senate 127-28, 203).

Petitioner also disclosed that after the break-in he received $25,000 from Mrs. E. Howard Hunt for the payment of legal fees, that he received his salary through January 1973, and that in the fall, E. Howard Hunt told him that each defendant who pleaded guilty would receive financial support in prison, executive clemency after serving a part of his sentence and perhaps a job after release. Moreover, according to petitioner, during his trial Gerald Alch, his attorney, told him that he would be called by a friend from the White House, who petitioner assumed would be John Caulfield, the person who had recruited him for the Re-Election Committee. Petitioner testified that he subsequently met with Caulfield on three occasions, but refused to discuss a job offer or executive clemency conditioned on a guilty plea and silence and firmly stated that he intended to plead not guilty and fight the case through the courts (Senate 130-131, 134, 138-140).

Finally, petitioner stated before the Committee that in late December 1972, before his trial began, he had determined to tell the true story of Watergate at a propitious time—"it was a day at a time decision on my part as to when was the proper issuance time to tell the facts on this case." According to

petitioner's testimony at that time, Alch never urged him to plead guilty or keep silent, and the decision not to defend the case on the ground of Mitchell's and Dean's involvement was petitioner's. (Senate 150, 242-243, 247.)

The post-trial motion. On June 8, 1973, petitioner filed a motion for a "writ of error coram nobis," asserting that he had newly discovered information wrongfully withheld from him that deprived him of evidence that could have been used to prove his innocence. Specifically, he claimed that he had been lulled by the Department of Justice and White House connections of his superiors into believing that any action he took on their behalf would have the "sanction of legality" (A. 20).[6] While he admitted that he was aware that Magruder had testified falsely at the trial about the involvement of Mitchell and Dean, he allegedly remained silent because his attorney had advised him not to testify. He acknowledged that he knew the general outline of an obstruction of justice designed to cover-up the identity of persons responsible for the break-in, including post arrest payments to defendants, but claimed that he was not fully aware of its extent (A. 17-18, 23-24, 39, 86).[7] In

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[6] "A." refers to the Appendix filed in the court of appeals.

[7] He also stated that he did know of the existence of the White House Special Investigations Unit (the so-called "Plumbers") in which some of his co-defendants participated (A. 15), and claimed that his prosecution represented impermissible prosecutorial selectivity. Petitioner also filed a motion, contending that he and his attorneys were victims of illegal governmental electronic surveillances. The Government

subsequent supporting affidavits, petitioner alleged that Alch had participated in White House efforts to buy his silence and to offer him executive clemency and had advised him that none of the defendants was to testify at the trial (A. 39, 86). On November 7, 1973, the trial court, after hearing argument on petitioner's motion and on motions of five co-defendants to withdraw their guilty pleas, denied him relief.[8]

ARGUMENT

1. Petitioner's initial contention is that the conspiracy by high government officials to obstruct the investigation and prosecution of the Watergate break-in deprived him of due process of law and tainted his trial. Although the underpinnings of his argument are unclear, he apparently contends that the conspiracy—which included perjurious testimony at his trial and efforts to secure his and his co-defendants' silence, for the purpose of concealing the identity of others responsible for the planning of the break-in and other illegal activities—prevented him from asserting a defense that it was his "professed belief that he was engaged in an intelligence gathering operation authorized by the highest levels of government, including the Attorney General, to ascertain planned illegal conduct" (Pet. 10-11).

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conducted a search and filed affidavits denying that there had been any surveillances of petitioner's conversations.

[8] Petitioner's counsel indicated that he thought an evidentiary hearing might not be necessary if Senate testimony could be made part of the record (Nov. 5 Tr. 95).

The simple answer to this argument—and the answer that demonstrates that this case does not present any substantial issue regarding the administration of justice that call for resolution by this Court—is that petitioner, fully aware of the basic facts that he now would present as a defense, deliberately chose not to disclose those facts or press his supposed defense at trial. As he concedes (Pet. 9), he had been told prior to the break-in that Mitchell and Dean had approved the operation. Moreover, he was aware of the perjurious testimony and the payment of hush money. He himself had received $25,000 and proffers of executive clemency and other assistance. By his own admission, however, the failure to assert a defense of authorization was not due to any pressure exerted on him, disloyalty of counsel, or the imagined hopelessness of proving the involvement of "higher-ups."[9] McCord testified under oath before the Senate Select Committee with the advice of counsel (Senate 242-43):

> Well, I had many conversations with Mr. Alch about the facts in the case, and the other principals involved and the decision of mine as to when to come forward with the information which I did as basically my decision and it was a day at a time decision on my part as to when

[9] Petitioner asserts that he had "deep distrust" of White House aides, the FBI, the prosecution and his own lawyers (Pet. 12). He never explains, however, why he waited for more than six weeks after his trial to disclose the facts within his knowledge to the trial judge, instead of going to him during the trial.

> was the proper issuance time to tell the facts on this case. * * * I think my decision has been the right one.

Having deliberately by-passed the opportunity to present his claims at trial, petitioner is not free to press them either on appeal or by collateral attack. See, *e.g.*, *Brady* v. *United States*, 397 U.S. 746 (1970); *United States* v. *Bridges*, 432 F.2d 692 (D.C. Cir. 1970); *Green* v. *United States*, 256 F.2d 483, 484 (1st Cir.), *cert. denied*, 358 U.S. 854 (1958).

The principle thrust of petitioner's contention (Pet 13-20) rests on allegedly newly discovered evidence—the conclusive evidence of the cover-up conspiracy that has come to light since petitioner's trial. He attempts to bolster this argument by relying on *Brady* v. *Maryland*, 373 U.S. 83 (1963), asserting that the prosecution should be charged with failure to disclose the evidence at trial (Pet. 19)[10] The court of appeals discussed this issue at length, and we rely primarily on the opinion below (Pet. App. 13a):

> McCord's failure to raise the defense of authorization below is not excused by either the existence of newly discovered evidence or by the

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[10] There is no basis as we discuss below, for concluding that any of the "new" evidence is exculpatory of petitioner. Moreover, there is nothing in the record or in the petition which supports the charge that the government—as distinguished from those illegally participating in the cover-up conspiracy—violated any duty of disclosure. Indeed, if petitioner had disclosed the information in his possession, it could have served as the key to opening up an earlier disclosure of the information upon which his present claim is based.

> efforts of some government officials to coerce him to remain silent and plead guilty. Since the only relevant factual issue is whether McCord reasonably believed that he was acting pursuant to the authorization of the Attorney General or Counsel to the President, an issue which must be largely determined by reference to facts in McCord's possession at the time of his actions, newly discovered evidence could *a fortiori* have only a tangential relation to this central issue. The newly discovered evidence discussed above does provide much more evidence that McCord was reasonable in believing this his actions were authorized but no more evidence that he actually did believe that his actions were so authorized. This newly discovered evidence is, thus, merely cumulative to evidence that McCord possessed at the time of the burglary and is not sufficient by itself to create in either our minds or the minds of the jury a reasonable doubt about McCord's guilt. Our finding on this point also disposes of McCord's collateral contention that his failure to raise the defense below was excused by the prosecution's failure to disclose this newly discovered evidence at the time of the trial. (Footnotes omitted.)

Finally, it is well settled that neither newly discovered evidence nor obstruction of justice at a trial justifies a new trial unless there is some reasonable likelihood that a new trial would result in an acquittal. See, *e.g.*, *Giglio* v. *United States*, 405 U.S. 150, 153-54 (1972); *United States* v. *Lemonakis*, 485 F.2d 941, 964 (D.C. Cir. 1973). There is no doubt whatsoever about petitioner's guilt or the outcome of

a new trial. If anything, the new evidence confirms petitioner's guilt. McCord was caught red-handed in the Democratic National Committee offices and never has denied that he was a principal operative in the break-in or the electronic surveillance. Instead, in a veiled way he refers to "authorization" at the highest levels of government. Significantly, however, he *did not allege below* that he believed the operation was *lawful*, that it had been approved by anyone *acting as a government official*, or that it was undertaken as a *government operation* or for a *governmental purpose*. In fact, when petitioner was asked the direct question before the Senate Select Committee whether at the time of the break-in he understood it was illegal, he responded, after consulting with counsel: "Yes, of course" (Senate 176).[11]

In brief, it was clear to petitioner at the time of the break-in that the break-in was authorized and engineered as a political espionage tactic without the remotest connection to any governmental purpose. Petitioner has acknowledged that the break-in was

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[11] Petitioner thus is left with the defense that because he acted pursuant to the directions of a government official, whether or not the government official was acting within his authority, and whether or not petitioner believed he was engaged in a legal operation, he lacked the requisite criminal intent. If that were true, the "mere fact" that a government official participated in blatantly illegal conduct would suffice to immunize all other participants from responsibility for their action. Clearly, as decisions of this Court have firmly held, that is not the law, either for government officials, *O'Shea* v. *Littleton*, 414 U.S. 488 (1974), or for those who do their bidding. *Gravel* v. *United States*, 408 U.S. 606 (1972).

part of a larger plan for gathering "political intelligence" (Senate 127-28, 203) and has testified to related instances of politically motivated espionage, including his own attempts to install eavesdropping devices in Senator McGovern's campaign headquarters (Senate 153-54). Petitioner's own admissions, then, serve only to corroborate the evidence at trial that he was fully aware that the break-in and electronic surveillance were part of a political operation designed to monitor "all conversations involving political strategy and a personal nature" (Tr. 1031). This clearly belies any claim that he was engaged in an operation "to ascertain planned illegal conduct" [12] or that there is any conceivable justification for his conduct.

2. The principal claim of prosecutorial misconduct rests on the assertion that the prosecutors knowingly presented false testimony from witnesses Magruder and Porter that no person higher up than Liddy was involved in the break-in (Pet. 21-24). Porter, however, was not asked about the involvement of others (Tr. 1423-1430B). And in offering the testimony of

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[12] Petitioner suggests for the first time that he acted to uncover alleged illegal activity based upon information that the Cuban government was making contributions to the Democratic National Committee (Pet. 8). Petitioner neither alleged this in his motion or affidavits below nor testified to this effect before the Senate Select Committee. As for the claim that the operation was undertaken to discover planned acts of violence directed against the re-election campaign of the President, the defense of "duress" was advanced at trial and properly rejected as a matter of law. See note 4, *supra*.

Magruder, the prosecutors were neither trying to hide the involvement of others nor deliberately offering false testimony. Contrary to petitioner's assertion, Hugh Sloan, the former treasurer of the Re-Election Committee never "informed the prosecutor of Magruder's probable perjury at the trial" (Pet. 23). While Sloan did notify the prosecutors that Magruder had asked him to underestimate the sums given to Liddy,[13] Magruder's trial testimony on this matter was accurate and consistent with Sloan's (Tr. 1435-36). There is, we submit, no credible evidence that the prosecutors knew, or had reason to know, that it was sponsoring perjured testimony by Magruder. This argument, as well as the implicit claim that the prosecution knowingly sought to conceal the involvement of others, is refuted by petitioner's own statement that the prosecutors wanted him to turn state's evidence (A.119).

The court below found "no support" for petitioner's "implied allegation" that he had been prejudiced by the supposed misconduct (Pet. App. 23a). Although Magruder in fact gave false testimony at the trial, the testimony concealing the involvement of others did not indicate in any way that petitioner was guilty of burglary, electronic surveillance, or the related offenses charged in the indictment. As we discussed above, truthful disclosure of the involve-

[13] Any discrepancy between Magruder's grand jury testimony and Sloan's was known to the defense before Magruder's trial testimony, since the prosecutor provided petitioners with copies of the grand jury testimony.

ment of higher-ups would not have tended to absolve petitioner of his guilt.[14]

3. The court below properly concluded that petitioner was not denied the effective assistance of counsel. The argument that counsel did not "vigorously assert all ethical defenses" (Pet. 28) ignores petitioner's unequivocal Senate testimony (Senate 242-43). As the quotation at pp. 9-10, *supra*, indicates, petitioner, after conversations with his attorney, made his own decision when to reveal the basic information upon which he now says he would bottom his defense.[15]

The present assertion that Alch attempted to coerce petitioner into pleading guilty and not testify at the trial (Pet. 30) is refuted by petitioner's Senate testimony that Alch never urged him to plead guilty or keep silent (Senate 150, 247). The dispute

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[14] Other alleged misconduct referred to in the petition—failure to recall petitioner before the grand jury after the trial and failure to track down certain materials of Hunt (Pet. 27-28)—obviously have no relevance to the determination of petitioner's guilt at his trial.

[15] Alch testified before the Senate Committee that he told petitioner that the crucial decision whether to testify could only be made by petitioner and that petitioner ultimately decided, without any reservations, not to testify (Senate 304). It was at that point, according to Alch, that petitioner disclosed that Mitchell had approved the operation.

Alch also denied that he spoke to petitioner about executive clemency and that he told petitioner that he would be hearing from the White House (Senate 302-303). Alch further stated that petitioner never had informed him that petitioner believed the Watergate operation was legal (Senate 296).

about making a CIA defense was resolved before the trial commenced in a conference with the court in which Alch agreed not to press such a defense and petitioner decided he would continue with Alch as one of his attorneys (Jan. 3, 1973, Tr. 3-4). Finally, as the court below found, the allegations that Alch funnelled information about petitioner's trial plans to the White House (Pet. 34-38) do not establish a conflict of interest or disloyalty, but under the circumstances here merely indicate that the attorney "was consulting with the persons who arguably authorized the crime for which McCord was being tried and was allegedly involved in the same conspiracy that McCord himself was involved in. . . . McCord's allegations thus reduce themselves to the claim that his attorney violated his confidences; however, in the facts of this case, this is not evidence of disloyalty. Even standing alone, such a violation would not be a deprivation of Sixth Amendment rights since McCord himself knew of these violations at the time. . . ." (footnotes omitted, Pet. App. 31a-32a).[16]

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[16] The fact that Alch agreed to produce electronic equipment to the prosecutor (the monitoring equipment, Pet, 32-33) did not enhance the chances of conviction since there was incontrovertible evidence that petitioner participated in the illegal break-in and electronic surveillance in the offices of the Democratic National Committee and was arrested with bugging equipment in his possession. Nor was there a breach of the agreement against using this equipment as evidence at trial. The letter, upon which petitioner relies, shows that

Thus, contrary to petitioner's assertion the decision below does not conflict with decisions of this Court or other courts of appeal on the assistance of counsel issue.[17] The court accepted petitioner's premise "that disloyalty or conflict of interest may, if substantial and proven, result in the denial of effective assistance of counsel in controvention of the Sixth Amendment" (Pet. App. 29a). See, *e.g.*, *Glasser* v. *United States*, 315 U.S. 60 (1942). That the court's appraisal of the facts resulted in rejection of the claim in the circumstances of this case does not warrant review by this Court.[18]

4. Petitioner, although he did not press the claim before the court of appeals, asserts that he was entrapped. It is obvious from the circumstances of this case that the relationship of petitioner and the other persons who were or had been government officials

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only "the fact of delivery" from petitioner, not the equipment itself, would not be used against petitioner (Pet, App. 37a).

[17] The court below followed the standard set forth in *United States* v. *DeCoster*, 487 F.2d 1197, 1202 (1973), for adjudicating claims of ineffective assistance of counsel: "a defendant is entitled to the reasonably competent assistance of an attorney acting as his diligent conscientious advocate."

[18] Petitioner in his post trial motion also complained that his attorney failed to cross-examine properly Magruder, Sloan and Porter (A. 121). He now asserts, for the first time, that he in fact urged his attorney to cross-examine Magruder on two specific points about the involvement of others in the Watergate operation (Pet. 29). This assertion, however, implicity conflicts with his post-trial letter and his sworn testimony that he waited for an appropriate time to open up the involvement of others. In addition, as we argue above, disclosure of the involvement could not have aided his defense.

does not contain the elements of entrapment as that defense has been developed in the federal courts. See *United States* v. *Russell*, 411 U.S. 423 (1973), in which this Court declined to enlarge the defense to cover defendants who willingly participated in ventures in which it might be said that the involvement of government undercover agents was "excessive." As the court below concluded, albeit in the context of another issue, "[t]he operative fact is that this conspiracy, of which McCord was a part for at least part of the time, was not designed so much to convict private criminals as to prevent additional convictions. This then is not a case of the end of law enforcement justifying the means, but of the end itself being, not law enforcement, but criminal activity." (Pet. App. 26a-27a.)

5. On the basis of a claim that the instant case is "the only case known to petitioner where an individual has been convicted for electronic eavesdropping pursuant to authorization by the highest law enforcement officials of this nation," petitioner argues that he has a defense based upon impermissible prosecutorial selectivity (Pet. 24-26). This defense, however, was not raised by pre-trial motion and is untimely under Rule 12(b) (2), F.R.Cr.P. See *Davis* v. *United States*, 411 U.S. 233 (1973); *United States* v. *Berrigan*, 482 F.2d 171, 174-175 (3d Cir. 1973). Nor do petitioner's complaints about his attorney warrant relief from this waiver. As we have pointed out, *supra*, petitioner's own testimony shows that he, rather than his attorney, made the

decision to keep silent about the involvement of Mitchell and Dean.

Moreover, on the merits, petitioner has no valid defense on this ground. His claim of authorization primarily rests upon an approval of electronic surveillance plans against a political party by an official about to become chairman of a rival political organization and carried out when this person is merely a former government official. A prosecution based upon such "unique" and "bizarre" facts cannot be fairly termed impermissibly selective. See *United States* v. *Berrigan, supra,* 482 F.2d at 179. Beyond that, petitioner does not suggest that his prosecution was based upon an unjustifiable standard such as race, religion or other arbitrary classification. See *Oyler* v. *Boyles,* 368 U.S. 488, 456 (1962). He also does not contend that he was singled out for prosecution because of his exercise of certain constitutionally protected rights. See *United States* v. *Berrios,* 501 F.2d 1207 (2d Cir. 1974). Indeed, if the United States Attorney had not sought an indictment in this case, he would have been condemned as aiding in an effort to prevent the discovery of the Watergate conspiracy and would have been charged with dereliction of his duty.

Finally, petitioner's argument that the pardoning of Richard Nixon furnishes a basis for relief from his judgment of conviction rests upon a misunderstanding of the nature of the power to pardon granted by Article II, section 2, clause 1 of the Constitution. The "very essence of the pardoning power

is to treat each case individually. * * * Individual acts of clemency inherently call for discriminating choices because no two cases are the same." *Schick* v. *Reed*, No. 73-5677, decided December 23, 1974. Moreover, even if this claim presented a substantial issue, it is not ripe for resolution. It was not presented below, and as the court concluded, "any legal questions that may arise from the pardon are not sufficiently focused by the adversary process to justify appellate consideration of their validity or substantially at this time" (Pet. App. 27a, n.59).

CONCLUSION

It is therefore respectfully submitted that the petition for a writ of certiorari should be denied.

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Special Prosecutor,

SIDNEY M. GLAZER,
Attorney.

March 1975

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